

EXHIBIT A

POULIN | WILLEY

TRIAL LAWYERS

REPLY VIA EMAIL TO:
CMAD@AKIMLAWFIRM.COM

August 15, 2023

Sent via E-mail

James Edward Bell , III
ebell@edbelllaw.com

Elizabeth Joan Cabraser
ecabraser@lchb.com

Robin Lynn Greenwald
rgreenwald@weitzlux.com

Zina Bash
zina.bash@kellerpostman.com

Mona Lisa Wallace
mwallace@wallacegraham.com

James A. Roberts , III
jar@lewis-roberts.com

Michael Dowling
mike@dowlingfirm.com

RE: Leadership Order Concerns *Case No.: 7:23-cv-00897-RJ In Re: Camp Lejeune Water Litigation*

Counselors:

I hope this letter finds you well. We write regarding the Court's July 19th Case Management Order (Dkt. No. 10) in the above captioned matter appointing a leadership group. As you may or may not know, our firm has thirteen (13)¹ filed cases currently in this action, including the first putative class action filed in this matter, additional claims currently pending before the Navy, and many more under review. We solely write to ensure our clients' claims and interests are protected throughout this process within leadership's plans for the litigation.

While we are confident that the Court has compiled a very capable group to lead this complex litigation, our firm does have some concerns about the process moving forward that we would like to raise and discuss with leadership. We have attempted to reach many of you by phone, text and email and to this point, have been unable to schedule a time to speak with you all. We do understand the burden that leadership roles have placed upon your firms, but we want to ensure that our clients' interests, along with the rest of the plaintiffs' interests in this litigation are heard and our concerns taken seriously.

¹ See 7:23-cv-00022-D-KS Williams et al v. United States of America; 7:23-cv-00025-D-KS Jenkins v. United

CENTRAL MAILING:
32 Ann Street, Charleston, SC 29403

As you know, the Court's July 19th Order outlines a plan for leadership to appoint committee members for various committees the Court feels will be needed to help expedite these claims to resolution. Our firm is ready, willing, and able to contribute however we can to a committee and to the leadership group as a whole, and would welcome the opportunity to discuss any potential committee roles our firm can fill in this litigation. By way of experience, our firm currently serves on leadership committees in some of the largest litigations in the country, including most recently the Plaintiffs' Steering Committee and discovery committee in MDL 3037 *In Re: Recalled Abbott Infant Formula Products Liability Litigation* and the Expert Committee in MDL 3043 *In re Acetaminophen – ASD-ADHD Products Liability Litigation*. Our preferred roles would be on the committees for Bellwether, Resolution, or Discovery and our firm feels our experience in the committees listed above, as well as other complex litigation committees, uniquely make us suited for a role in this litigation as well.

Finally, Counsel has several issues with the Court's July 19th Case Management Order (Dkt. No. 10), particularly that the order cites to no authority of the Court to even consolidate this action under the current plan. It has been undersigned counsel's belief from the onset of these actions that the most appropriate course would be to consolidate under the first filed class action. *See 7:23-cv-00022-D-KS Williams et al v. United States of America*. For this reason, we are concerned that if we are not named to a committee role and have no say in the direction of the case as it pertains to our clients, we will be forced to appeal this order so as to protect our clients' interest in these cases and the processes used to move them toward resolution.

For the reasons articulated in this letter, undersigned counsel intends to file a Motion for Reconsideration of the Court's Leadership Order tomorrow, but hopes such a drastic step will not be necessary and look forward to any and all replies.

Sincerely,

s/ Roy T. Willey, IV

s/ Paul Doolittle

s/ Blake G. Abbott